

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IOENGINE, LLC,)	
)	
Plaintiff/Counterclaim)	
Defendant,)	
)	
v.)	C.A. No. 18-452 (WCB)
)	
PAYPAL HOLDINGS, INC.,)	<div style="background-color: black; width: 250px; height: 20px;"></div>
)	
Defendant/Counterclaim)	
Plaintiff.)	REDACTED - PUBLIC VERSION

**DECLARATION OF TRAVIS JENSEN IN SUPPORT OF PAYPAL’S PROFFER OF
FACTS AND EVIDENCE IN SUPPORT OF NO PRIVACY/REAL PARTY IN INTEREST
BETWEEN PAYPAL AND INGENICO**

I, Travis Jensen, do hereby declare as follows:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, and counsel of record for Defendant PayPal Holdings, Inc. (“PayPal”).
2. Attached to this declaration are true and accurate copies of the following documents, as cited in PayPal’s Proffer of Facts and Evidence in Support of No Privacy/Real Party in Interest Between PayPal and Ingenico, filed contemporaneously herewith:

Exhibit	Document
1	Excerpts from the Pretrial Conference hearing transcript, dated June 13, 2022
2	<i>Ingenico Inc. v. IOENGINE, LLC</i> , IPR2019-00416, Paper 60 (PTAB Jul. 13, 2020), Final Written Decision
3	<i>Ingenico Inc. v. IOENGINE, LLC</i> , IPR2019-00879, Paper 69 (PTAB Sep. 21, 2020), Final Written Decision
4	<i>Ingenico Inc. v. IOENGINE, LLC</i> , IPR2019-00929, Paper 53 (PTAB Sep. 21, 2020) Final Written Decision
5	Excerpt from PayPal Holdings, Inc. Form 10-K for the year ending December 31, 2020 (PP0203008)

Exhibit	Document
6	Miura Software Update (PP0030538) [Filed Under Seal]
7	Email correspondence re MagTek Contract and SDK rights, dated August 16-17, 2012 (PP0105261) [Filed Under Seal]
8	MagTek Reader Specifications (PP0057065) [Filed Under Seal]
9	Email re Mobile + GD PPP for week ending 6/15/2012, dated June 18, 2018 (PP0104937) [Filed Under Seal]
10	Partner Agreement between PayPal Pte. Ltd and Miura Systems Limited (PP0004406) [Filed Under Seal]
11	Agreement for the Supply of Card Reader Devices between iZettel Merchant Services AB and Datecs Ltd (PP0195064) [Filed Under Seal]
12	First Amendment to Agreement for the Supply of Card Reader Devices between iZettel Merchant Services AB and Datecs Ltd (PP0195060) [Filed Under Seal]
13	Amendment to Agreement for the Supply of Card Reader Devices between iZettel Merchant Services AB and Datecs, Ltd (PP0195088) [Filed Under Seal]
14	Second Amendment to Agreement for the Supply of Card Reader Devices between iZettel Merchant Services AB and Datecs Ltd (PP0195097) [Filed Under Seal]
15	Amendment of Partnering Agreement between PayPal Payments Pte. Ltd and Miura Systems Limited (PP0004434) [Filed Under Seal]
16	Novation of Partnering Agreement between PayPal Pte. Ltd, PayPal Payments Pte. Ltd, and Miura Systems Limited (PP0004443) [Filed Under Seal]
17	Press Release: PayPal Brings PayPal Zettle to the U.S. – Its Digital In-Person and Omnichannel Solution (PP0195102)
18	Excerpts from the deposition transcript of Satish Govindarajan, taken on September 28, 2021 [Filed Under Seal]
19	Excerpts from the 30 (b)(1) deposition transcript of Alex Gromadzki, taken on October 20, 2021 [Filed Under Seal]
20	Roam Data Custom Product Sales Agreement between ROAM Data, Inc. and PayPal, Inc. (PP0004560) [Filed Under Seal]
21	Amendment No. 5 to Custom Product Sales Agreement between ROAM Data, Inc. and PayPal, Inc. (PP0028741) [Filed Under Seal]

Exhibit	Document
22	Excerpts from the 30 (b)(6) deposition transcript of Alex Gromadzki, taken on October 20, 2021 [Filed Under Seal]
23	Excerpts from the Summary Judgment and Daubert motions hearing transcript, dated June 7, 2022
24	Settlement Agreement between MobilePay LLC and Ingenico, Inc. (PP0026737) [Filed Under Seal]
25	Excerpts from the Spoliation motion hearing transcript, dated April 6, 2022
26	PayPal's Initial Disclosures Under Fed. R. Civ. P. 26(a)(1), dated July 30, 2018
27	IOENGINE, LLC's First Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6) to PayPal Holdings, Inc., dated May 5, 2021 [Filed Under Seal]
28	Excerpts from a hearing transcript, dated September 29, 2021
29	PayPal Updated Reader Quantity and Sales (PP1006059) [Filed Under Seal]
30	Amendment 2 to Custom Product Sales Agreement between ROAM Data, Inc. and PayPal, Inc. (PP0004558) [Filed Under Seal]
31	PayPal Quarterly Business Review Meeting Debrief (PP0184557) [Filed Under Seal]
32	Final Search Terms for Satish Govindarajan
33	Plaintiff IOENGINE LLC's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1), dated July 30, 2018

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 1st day of July, 2022.

/s/ Travis Jensen

Travis Jensen

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 1, 2022, upon the following in the manner indicated:

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